IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

IN RE: MOTION FOR CIVIL CONTEMPT (BMC)

Civil Action No. 1:12-mc-00557-BMC

Oral Argument Requested

NOTICE OF MOTIONS BY THE ASSOCIATED PRESS TO INTERVENE AND UNSEAL

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, and upon all prior records and proceedings herein, Movant-Intervenor The Associated Press ("AP"), by and through its undersigned counsel, will move this Court, before the Honorable Brian M. Cogan U.S.D.J., in room 8C South of the United States Courthouse, located at 225 Cadman Plaza East, Brooklyn, NY 11201, on the 23rd day of March, 2016 at 9:30 a.m. or as soon thereafter as counsel can be heard, pursuant to Fed. R. Civ. P. 24 to intervene for the limited purposes of unsealing the Court's order(s) sealing the record in this civil action from public view, and the parties' submissions related thereto.

February 25, 2016

Respectfully submitted,

Of Counsel: LEVINE SULLIVAN KOCH & SCHULZ, LLP

Karen Kaiser Brian Barrett

The Associated Press 450 West 33rd Street New York, NY 10001 Telephone: (212) 621-7547

Fax: (212) 506-6131

E-mail: kkaiser@ap.org E-mail: bbarrett@ap.org By: /s/ Jay Ward Brown
Jay Ward Brown
321 West 44th Street, Suite 1000
New York, NY 10036

(212) 850-6100

Attorney for The Associated Press